

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JULIO ROCHA,

Plaintiff,

v.

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON; AXIS SPECIALTY EUROPE SE,

Defendants.

Civil Action No.: **1:16-CV-02327 (RJD)
(RML)**

**SUPPLEMENTAL DECLARATION OF
JULIO ROCHA IN FURTHER
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION**

I, Julio Rocha, declare as follows:

1. I am a defendant in the related criminal case *United States v. Webb, et al.*, 1:15-cr-00252 (S-1) (RJD) (RML), and along with co-defendants have been charged with a number of serious felonies. If convicted, I face the possibility of many years of incarceration.

2. To adequately defend myself against these serious charges, I have chosen to retain the law firm of Pillsbury Winthrop Shaw Pittman. I selected Pillsbury because their lawyers have the expertise and experience to be able to defend me in this very complicated and complex matter, and I have great confidence in their abilities.

3. I am entitled to the advancement of my attorneys' fees under FIFA's D&O liability insurance policy.

4. Without the advancement of those fees, I am unable to afford to pay for the legal fees necessary to mount a defense to the charges against me. Neither I nor my immediate family have the resources to defend myself. Indeed, my family and I are of very limited means.

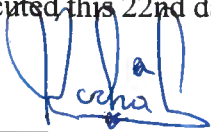
5. In fact, my bond allowing me to be on home detention (at the very modest home of a distant relative in Florida) was secured only because distant relatives and friends were willing and able to pledge various assets and properties. Neither I nor my immediate family owned any



assets or property that could be pledged. Indeed, to the best of my knowledge, I am the only defendant in this case to date who has not been able to secure his release pending trial by pledging some or all of his own property or assets.

I declare under penalty of perjury that the foregoing is true and correct

Executed this 22nd day of June 2016.

A handwritten signature in blue ink, appearing to read 'Julio Rocha', is written over a horizontal line.

Julio Rocha